

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
BALMORAL RACING CLUB, INC.,)	Case No. 14-45711
)	
Debtor.)	Honorable Donald R. Cassling
)	

In re:)	Chapter 11
)	
MAYWOOD PARK TROTTING ASSOCIATION, INC.,)	Case No. 14-45718
)	
Debtor.)	Honorable Donald R. Cassling
)	
)	Hearing Date: December 30, 2014
)	Hearing Time: 9:30 a.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Tuesday, December 30, 2014, at 9:30 a.m.** we shall appear before the Honorable Donald R. Cassling of the United State Bankruptcy Court for the Northern District of Illinois, or any other judge sitting in his place and stead, at Courtroom 619 in the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present the **MOTION OF DEBTORS FOR ENTRY OF AN ORDER DIRECTING JOINT ADMINISTRATION OF CASES**, a copy of which is hereby served upon you.

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)
NATHAN Q. RUGG, ESQ. (ARDC #6272969)
ALEXANDER F. BROUGHAM, ESQ. (ARDC #6301515)
ADELMAN & GETTLEMAN, LTD.
53 West Jackson Blvd, Suite 1050
Chicago, Illinois 60604
Tel (312) 435-1050
Fax (312) 435-1059
**Proposed Counsel for Balmoral Racing Club, Inc. and
Maywood Park Trotting Association, Inc.**

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that true and correct copies of this notice and motion were served upon the parties listed on the service list attached hereto via CM/ECF, overnight delivery, and/or facsimile, as indicated therein, on November 24, 2014.

By: /s/ Nathan Q. Rugg

SERVICE LIST

VIA FAX:

Empress Casino Joliet Corporation
Des Plaines Development Limited
Partnership
Hollywood Casino-Aurora, Inc.
Elgin Riverboat Resort-Riverboat Casino
c/o Robert Andalman, Esq.
542 South Dearborn, 10th floor
Chicago, IL 60605
FAX: 312-341-0700
Litigation Counsel

c/o Jeremy D. Margolis, Esq.
Loeb & Loeb LLP
321 North Clark Street, suite 2300
Chicago, IL 60654
FAX: 312/277-8957
Litigation Counsel

Patrick S. Layng, Esq.
Office of the U.S. Trustee
Region 11
219 S. Dearborn Street, Room 873
Chicago, IL 60604
FAX: 312-886-5794

Eric S. Rein, Esq.
Horwood Marcus & Berk, Chartered
500 West Madison, suite 3700
Chicago, IL 60661
FAX: 312/606-3232
represents FirstMerit Bank

James D. Newbold, Esq.
Assistant Attorney General,
Revenue Litigation Bureau
Office of the Illinois Attorney General
100 West Randolph Street, suite 13-222
Chicago, IL 60601-3218
FAX: 312/814-3589
represents State of Illinois/IRB

Doug Lipke, Esq. (Bankruptcy Counsel)
Vedder Price, P.C.
222 North LaSalle Street, suite 2600
Chicago, IL 60601-1104
FAX: 312/609-5005
represents Empress Casino Joliet Corporation, Des Plaines Development Limited Partnership, Hollywood Casino-Aurora, Inc., Elgin Riverboat Resort-Riverboat Casino
Bankruptcy Counsel

Joseph D. Frank, Esq./Frances Gecker, Esq.
324 North LaSalle, Suite 623
Chicago, IL 60654
FAX: 312/276-0035
represents Illinois Harness Horsemen's Association

Scott R. Clar, Esq.
Crane Heyman Simon Welch & Clar
135 South LaSalle Street, suite 3705
Chicago, IL 60603-4101
FAX: 312/641-7114
represents John Johnston

RGS
Red Rock Administrative Services
9275 West Flamingo Road, Suite 120
Las Vegas, NV 89147
attn.: Rob Terry
FAX: 702/243-6885

MidAmerican Energy Company
P.O. Box 8020
Davenport, IA 52808
attn.: Paula Paaske
FAX: 563/333-8749

Woodbine Entertainment
55 Rexdale Boulevard, Box 156
Toronto, Ontario, Canada M9W 5L2
attn.: Chermain Simon
FAX: 416/213-2127

Illinois Harness Horsemen's Association
15 Spinning Wheel Road, Suite 406
Hinsdale, IL 60521
attn.: Tony Somone
FAX: 630/323-0761

Roberts Communications Network
4175 Cameron Street, suite 10
Las Vegas, NV 89103
attn.: Todd Roberts/Joanne Colon
FAX: 702/227-7585

Expressbet
200 Racetrack Road, bldg. 26
Washington, PA 15301
attn.: Krystal Parish
FAX: 724/229-6226

Northfield Park Associates, LLC
10705 Northfield Road
P.O. Box 374
Northfield, OH 44067
attn.: Sharon Pratt
FAX: 330/468-8975

Delta Downs
2717 Delta Downs Dr.
Vinton, LA 70668
attn.: Mary Migues
FAX: 337/589-3542

Pompano Park Assoc.
1800 S.W. Third Street
Pompano Beach, FL 33069
attn.: Heather Belmonte
FAX: 954-972-9970

Penn National c/o MRTA
P.O. Box 32
Grantville, PA 17028
attn.: Adrienne Hill
FAX: 717/469-3397

Yonkers Raceway
810 Central Avenue
Yonkers, NY 10704
attn.: Toni Gallow
FAX: 914/457-2419

New Meadowslands Racetrack LLC
Pari Global Solutions, Inc.
7950 Dublin Blvd., suite 216
Dublin, CA 94568
attn.: Laura Nevels
FAX: 925/803-8168

Red Mile
c/o Lexington Trots Breeders Assn, LLC
1200 Red Mile Road
P.O. Box 420
Lexington, KY 40588
attn.: Susan Denny
FAX: 859/258-7697

Amwest Entertainment LLC
13011 W. Highway 42, suite 107
Prospect Heights, KY 40059
attn.: Brittany Goodman
FAX: 502/292-1076

Monarch Content Management
285 West Huntington Drive
Arcadia, CA 91007
attn.: Xenia Prato
FAX: 626/821-1523

Churchill Downs
c/o United Tote Settlement Dept.
600 N. Hurstbourne Pkwy, suite 400
Louisville, KY 40222
attn.: Tara Stout
FAX: 502/638-3893

Del Mar Thoroughbred Club
2260 Jimmy Durante Blvd.
Del Mar, CA 92014
attn.: Laurie McKee
FAX: 858/792-6157

Evangeline Downs
2235 Creswell Lane
Opelousas, LA 70570
attn.: Del Perry
FAX: 337/942-4599

Arlington Park International Race Course
2200 W. Euclid Ave
Arlington Heights, IL 60005
attn: Dan Peters
FAX: 847-255-4331

Cook County Collector
PO Box 641847
Chicago, IL 60664-1847
attn: Maria Pappas
FAX: 312-603-2147

Hawthorne Race Course
3501 South Laramie Ave
Cicero, IL 60804
attn: Pam Nickels
FAX: 708-780-3677

Illinois Harness Horsemen's Assn
15 Spinning Wheel Road
Suite 432
Hinsdale, IL 60521
attn: Tony Simone
FAX: 630-323-0761

Ohio Settlement Agent
P.O. Box 374
Northfield, OH 44067
attn: Ben Moldovan
FAX: 330-468-8975

Pari Global Solutions, Inc
7950 Dublin Blvd, Suite 216
Dublin, CA 94568
attn: Laura Nevels
FAX: 925-803-8168

Premier Gateway International
4th Floor, Victory House Extension
24-28 Prospect Hill
Douglas Isle Of Man IM1 1EQ UK
attn: Donna Hughes
FAX: 44 1624-613968

Remington Park
One Remington Place
Oklahoma City, OK 73111
attn: Chris Beam
FAX: 972-642-9363

Village Of Melrose Park
1000 N. 25th Ave.
Melrose Park, IL 60160
attn: Rose Vasquez
FAX: 708-343-8015

VIA OVERNIGHT DELIVERY:

Elite Turf Club
5340 Runningbrook Road
Las Vegas, NV 89120
attn.: Sam Kirshenbaum

DuPage County Treasurer
421 N. County Farm Rd.
Wheaton IL 60189
attn: Gwen Henry

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
BALMORAL RACING CLUB, INC.,)	Case No. 14-45711
)	
Debtor.)	Honorable Donald R. Cassling
)	

In re:)	Chapter 11
)	
MAYWOOD PARK TROTTING ASSOCIATION, INC.,)	Case No. 14-45718
)	
Debtor.)	Honorable Donald R. Cassling
)	
)	Hearing Date: December 30, 2014
)	Hearing Time: 9:30 a.m.

**MOTION OF DEBTORS FOR ENTRY OF AN ORDER
DIRECTING JOINT ADMINISTRATION OF CASES**

NOW COME Balmoral Racing Club, Inc. (“**Balmoral**”) and Maywood Park Trotting Association, Inc. (“**Maywood**”), debtors and debtors in possession (collectively, the “**Debtors**”), and, though their undersigned proposed counsel, hereby move this Court, pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order directing the joint administration of their respective chapter 11 cases for procedural purposes only (the “**Motion**”). In support of the Motion, the Debtors respectfully state as follows:

I. FACTUAL BACKGROUND

1. On December 24, 2014 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 et seq. (the “**Code**”). Since the Petition Date, the Debtors have remained in possession of their

assets and have continued to operate their businesses as debtors in possession in accordance with 11 U.S.C. §§ 1107 and 1108.

2. Neither a trustee nor a committee of unsecured creditors has been appointed in the Chapter 11 Cases.

3. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue lies properly in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). The predicates for the relief requested herein are section 105(a) of the Code and Rule 1015 of the Bankruptcy Rules.

4. The nature of the Debtors' businesses and the factual background relating to the commencement of the Chapter 11 Cases are set forth in more detail in the Declaration of Randall Olech in Support of Chapter 11 Petitions and First-Day Motions¹ (the "**Declaration**") filed on the Petition Date and incorporated herein by reference.

II. RELIEF REQUESTED

5. By this Motion, the Debtors seek an order directing the joint administration of these Chapter 11 Cases, for procedural purposes only, subject to Bankruptcy Rule 1015(b).

6. The joint administration of the Chapter 11 Cases will obviate the need for duplicate notices, applications, and orders, and thereby save considerable time and expense for the Debtors and, consequently, their estates. The Debtors anticipate that numerous notices, applications, motions, pleadings, hearings, and orders will affect several of the Debtors.

7. Joint administration will also save time and money and avoid duplication and potentially confusing filings by permitting counsel for all parties in interests to (a) use a single caption on the numerous documents that will be served and filed in the Chapter 11 Cases; and (b)

¹ Any capitalized terms not otherwise defined in the Motion shall have the same meaning as ascribed in the Declaration.

file papers in one case rather than in multiple cases. Joint administration will also protect parties in interest by ensuring that parties to each of the Chapter 11 Cases are apprised of all the various matters before the Court in these cases.

8. The rights of the respective creditors of the Debtors will not be adversely affected by joint administration of these Chapter 11 Cases, because each creditor may still file its claim against a particular estate; the relief sought is purely procedural and is in no way intended to affect substantive rights. In fact, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration.

9. The Clerk of the Court will also be relieved of the burden of entering duplicative orders and maintaining duplicative files. Finally supervision of the administrative aspects of the Chapter 11 Cases by the Office of the United States Trustee will be simplified.

10. For the foregoing reasons, the interests of the Debtors and their creditors and equity security holders would be best served by joint administration of the Chapter 11 Cases.

11. To facilitate the joint administration of the Chapter 11 Cases, the Debtors request that the official caption to be used by all parties in the jointly administered cases be as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
BALMORAL RACING CLUB, INC., and)	Case No. 14-45711
MAYWOOD PARK TROTTING)	(Jointly Administered)
ASSOCIATION, INC.,)	
)	Honorable Donald R. Cassling
Debtors.)	
_____)	

12. The Debtors also request that a docket entry substantially similar to the following be entered on the docket of each case that is not the lead case to reflect the joint administration of the Chapter 11 Cases:

An order pursuant to Federal Rule of Bankruptcy Procedure 1015(b) has been entered in this case directing the joint administration of the chapter 11 cases of Belmont Racing Club, Inc. (Case No. 14-45711) and Maywood Park Trotting Association, Inc. (Case No. 14-45718). In re Belmont Racing Club, Inc. has been designated the “lead” case. Accordingly, the docket in Case No. 14-45711 should be consulted for all matters affecting the chapter 11 case of this debtor.

III. BASIS FOR RELIEF REQUESTED

13. Pursuant to Bankruptcy Rule 1015(b), if two or more petitions for relief are pending in the same court by or against a debtor and an affiliate or general partner, the court may order joint administration of the cases. The Debtors are “affiliates” as that term is defined in section 101(2) of the Code; one hundred percent (100%) of the issued and outstanding stock in both Debtors is held by a holding company, World Wide Wagering, Inc., a Delaware corporation. Accordingly, this Court is authorized to grant the relief requested herein.

14. Section 105(a) of the Code also provides this Court with the power to grant the relief requested herein. Section 105(a) states that a bankruptcy court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Code. 11 U.S.C. § 105(a).

IV. NOTICE

15. Notice of the filing of this Motion and the hearing scheduled therefor has been provided by CM/ECF, overnight delivery, and/or facsimile to: (a) the Office of the United States Trustee for the Northern District of Illinois; (b) Balmoral’s 20 largest unsecured creditors pursuant to Federal Rule of Bankruptcy Procedure 1007(d); (c) Maywood’s 20 largest unsecured

creditors pursuant to Federal Rule of Bankruptcy Procedure 1007; and (d) all other parties who have requested notice and service of pleadings in either of the Chapter 11 Cases. In light of the nature of the relief requested, the Debtors submit that no other or further notice is required.

WHEREFORE, Balmoral Racing Club, Inc. and Maywood Park Trotting Association, Inc., debtors herein, respectfully request the entry of an order in accordance with the foregoing recommendations in the form filed herewith and made a part hereof without further notice, and for such other and further relief as is just.

Respectfully Submitted,

BALMORAL RACING CLUB, INC. and
MAYWOOD PARK TROTTHING
ASSOCIATION, INC.

By: /s/ Nathan Q. Rugg
One of their proposed attorneys

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)
NATHAN Q. RUGG, ESQ. (ARDC #6272969)
ALEXANDER F. BROUGHAM, ESQ. (ARDC #6301515)
ADELMAN & GETTLEMAN, LTD.
53 West Jackson Blvd., Suite 1050
Chicago, Illinois 60604
Tel (312) 435-1050
Fax (312) 435-1059
Proposed Counsel for the Debtors